

Appendix A to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Brief dated October 7, 2024 [ECF No. 404]	Motion describes, by characterization and quotation of documents produced by Save On SP, LLC (“SaveOn”) during discovery: (1) SaveOn’s business strategy for setting copay amounts, and (2) SaveOn’s business practices and marketing materials for communicating with patients, comprising proprietary business information. <i>See</i> ECF No. 404.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the brief is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn’s proprietary business information.	No	No objection
Mangi Declaration Ex. 3 [ECF No. 404]	Exhibit 3 is an email chain between SaveOn employees and one of its health plan clients. Exhibit 3 discusses SaveOn’s marketing material and business	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the dis-	No	No objection

	practices, comprising proprietary business information. <i>See</i> ECF No. 404 Ex. 3.	information be disclosed to competitors and other market participants.	closure of SaveOn's proprietary business information.		
Mangi Declaration Ex. 4 [ECF No. 404]	Exhibit 4 is an internal SaveOn slide deck used to train SaveOn employees to speak with patients on SaveOn-advised plans. The deck reflects SaveOn's business and marketing practices, comprising proprietary business information. <i>See</i> ECF No. 404 Ex. 4.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Mangi Declaration Ex. 5 [ECF No. 404]	Exhibit 5 is an internal email chain between SaveOn employees. Exhibit 5 discusses SaveOn's marketing material and business practices for communicating with its health plan clients, comprising proprietary business information. <i>See</i> ECF No. 404 Ex. 5.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Mangi Declaration Ex. 6 [ECF No. 404]	Exhibit 6 is SaveOn's supplemental Responses and Objections to Johnson & Johnson Healthcare Systems	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to	No	No objection

	Inc.'s ("J&J") Interrogatory No. 21. The R&Os disclose SaveOn's strategy for drafting marketing material regarding changes in J&J's copay assistance terms and conditions, comprising proprietary business information. <i>See</i> ECF No. 404 Ex. 6.	non-public business information and strategy be disclosed to competitors and other market participants.	prevent the disclosure of SaveOn's proprietary business information.		
Mangi Declaration Ex. 8 [ECF No. 404]	Exhibit 8 is a draft of a letter SaveOn created for patients in response to changes in J&J's copay assistance terms and conditions, comprising proprietary business information. <i>See</i> ECF No. 404 Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Mangi Declaration Ex. 9 [ECF No. 404]	Exhibit 9 is an internal SaveOn training document used to instruct SaveOn employees about how to speak with patients on SaveOn-advised plans. The document reflects SaveOn's business and marketing practices, comprising proprietary	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	business information. <i>See</i> ECF No. 404 Ex. 9.				
Brief dated November 4, 2024 [ECF No. 431]	Brief discloses SaveOn's business strategy for and for marketing its services and terms to health plan clients and patients, comprising proprietary business information. <i>See</i> ECF No. 431.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the brief is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Nelson Declaration Ex. 1 [ECF No. 431]	Exhibit 1 is SaveOn's supplemental Responses and Objections to J&J's Interrogatory No. 21. The R&Os disclose SaveOn's strategy for drafting marketing material regarding changes in J&J's copay assistance terms and conditions, comprising proprietary business information. <i>See</i> ECF No. 431 Ex. 1.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Nelson Declaration Ex. 7 [ECF No. 431]	Exhibit 7 is an internal email chain between SaveOn employees discussing a letter SaveOn drafted to explain its services to patients, comprising proprietary business	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative than filing the exhibit entirely under seal is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	information. <i>See</i> ECF No. 431 Ex. 7.				
Brief dated November 26, 2024 [ECF No. 458]	Brief characterizes SaveOn's strategy for determining which drugs to include on its list, comprising proprietary business information. <i>See</i> ECF No. 458.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection